



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME: Mid-City Plating Company

EPA ID No.: IND 006 049 456

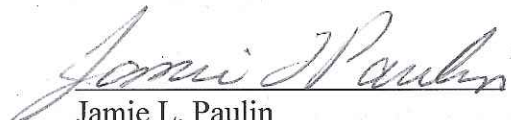
LOCATION ADDRESS: 921 East Charles Road
Muncie, Indiana 47305

NAICS CODE(S): 332813 [Electroplating, Plating, Polishing, Anodizing, and Coloring]

DATE OF INSPECTION: September 11, 2013

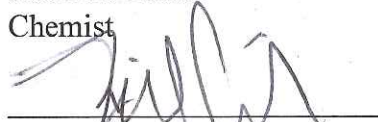
EPA INSPECTOR: Jamie L. Paulin
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PREPARED BY:


Jamie L. Paulin
Chemist

9/24/14
Date

REVIEWED BY:


Michael Cunningham, Chief
Compliance Section 1
RCRA Branch

5/20/14
Date

INTRODUCTION:

The purpose of the inspection was to conduct an un-announced Case Development Inspection (CDI) at the Mid City Plating Company (Mid City Plating), located at 912 East Charles Street, Muncie, Indiana, to examine Mid City Plating's management of its Resource Conservation and Recovery Act (RCRA) regulated waste, and to determine Mid City Plating's Compliance with RCRA, including used oil regulations. EPA conducted a compliance evaluation inspection (CEI) at this location on June 22, 2010.

Mid City Plating notified as a large quantity generator (LQG) on or about March 1, 1990, and had remained in LQG status until 2008, when they re-notified as a small quantity generator. Then in 2010, they reported on the March 2, 2010, biennial report, as a conditionally exempt small quantity generator. Based on the amount of hazardous waste accumulated on site since the last off-site shipment, Mid City Plating was operating as an LQG at the time of the inspection.

Mid City Plating is mainly operating two of four plating lines; and they are currently using cyanide within one of the plating operations. They also have a waste water treatment unit (WWTU) on-site and generate F006 hazardous waste sludge from the treatment of waste water from the plating lines. They previously stored the F006 hazardous waste in a roll-off container, which was stored in an outdoor concrete hazardous waste storage area. At the time of this inspection, they were storing the F006 in 20 cubic yard boxes. They were also storing F008 hazardous waste in 55-gallon containers. Both types of hazardous waste were being stored in a hazardous waste storage area inside of the building. They were no longer using the outdoor hazardous waste storage area. See, photograph 28.

Mid City Plating operates with one shift and employs approximately 5 employees.

OPENING CONFERENCE:

I entered the Mid City Plating facility at 10:30 am on September 11, 2013. I presented my credentials, and described the purpose of my visit. I met with Mr. Marc Muzzarelli, Production Manager. The personnel that were in attendance at the opening conference are listed in *Table 1*.

Table 1. Personnel in Attendance during CEI at Mid City Plating.

Personnel	Title	Department
Marc Muzzarelli	Production Manager	Mid City Plating
Jamie Paulin	Chemist	EPA RCRA Branch

Mr. Muzzarelli did not make a CBI claim on the information gathered during the inspection or on the photos taken, documents copied and/or verbal information provided. Mr. Muzzarelli described the current process and operations of Mid City Plating during the opening conference. He also gave me updated information on their current process and financial situation. We began the physical site inspection immediately following the opening conference.

SITE INSPECTION:

Mr. Muzzarelli escorted me on the physical site inspection, which began at the Hanson Line. This Line was not in-use at the time of the inspection. However, there was still sludge and liquid located within the waste water treatment trench/grate, as was observed during the June 2010 CEI. *See*, photographs 1 and 2.

We then proceeded to the E-Coat Line. Also, as observed during the June 2010 CEI, liquid was still located in the waste water treatment trench. Mr. Muzzarelli explained that the liquid would be a non-hazardous material based on the type of material used in the E-Coat Process. *See*, photographs 3 and 8.

The hazardous waste storage area was located near the E-Coat Line. Twenty-six 55-gallon containers of F008 hazardous waste were being stored on pallets. Four of the twenty-six containers did not have a label with the words, "Hazardous Waste," or with a date of accumulation. Also, four of the twenty-six containers were labeled with dates of accumulation greater than ninety days from the date of this inspection. The dates listed on the containers were: 4/16/13, 4/17/13, 4/23/13, and 5/21/13. The F006 hazardous waste treatment sludge was being stored in 20 cubic yard boxes in this area. Four of six 20 cubic yard boxes did not contain the words, "Hazardous Waste." Three of the boxes were labeled with accumulation dates greater than ninety days. The dates listed on the containers were: 7/19/12, 3/13/13 and 5/23/13. *See*, photographs 4, 5, 6 and 7.

We continued to a room in the central area of the facility. A container trench and a trench/grate, located on the floor and below floor level, had been cleaned. The material cleaned out of the trenches was being stored in containers that were marked with the hazardous waste number F006. This area was also being used as a raw materials storage room. Empty containers and raw materials were stored on the shelving unit. *See*, photographs 9 through 12.

From the storage room, we traveled to the Barrel Line area. Again, as in the June 2010 CEI, debris and material were located near and underneath the line. Debris and material were still located within the waste water treatment trench. In addition to debris, liquid was also located within the containment area underneath the Barrel Line. A blue/green material was being stored in an open container. According to Mr. Muzzarelli, the material was Rit dye. He explained that the parts were dipped into the container of dye for staining purposes. A passivation bath was also being stored in this area. The bath container was mostly empty; however, a light film of liquid was located at the bottom of the tub. *See*, photographs 13 through 17.

The next area of inspection was the WWTU. The F006 hazardous waste filter press box was kept covered and did contain a sign with the words, "Hazardous Waste," along with an accumulation date. The filter press F006 hazardous waste is then placed into a 20 cubic yard box, being stored near the filter press box. Therefore, this box was the collection point of the F006 hazardous waste. However, the box did not contain the words, "Hazardous Waste," and did not contain a start date of accumulation. In addition, the box was not being kept closed during storage, when waste was not being added to or removed from the container. *See*, photograph 18.

After the waste water treatment unit inspection area, we continued to the Jessup Plating Line. As observed during the June 2010 CEI, material was located in the containment pit, below the plating line. The Jessup Plating Line process did still include cyanide as a process material. Mr. Muzzarelli stated that a hose and a pump are used to pump the material back into the process bath; however, the containment pit was filled with liquid and debris up to the top of the pit. Mr. Muzzarelli explained that this liquid would be a hazardous waste if collected for disposal. *See*, photographs 19 and 20.

In addition, liquid was still located in the WWTU trench, which leads from the Jessup Plating Line to the WWTU. *See*, photograph 23.

However, the puddles of water that were observed on the floor near the Jessup Plating Line during the June 2010 CEI, were no longer present. *See*, photograph 22.

I then inspected the Utilite Machine area. This machine was not in-use at the time of the inspection. Mr. Muzzarelli expressed that the machine is being re-commissioned for future use. The material/waste and kitty litter that was observed on the floor on the outside of the machine during the June 2010 CEI, had been cleaned and containerized. However, material and debris were located inside of the machine. Additionally, material and debris were located below the machine. The machine had not been in operation since, at least, 2010. Mr. Muzzarelli explained that the material would be hazardous if removed. *See*, photographs 24, 25, 31 and 32.

One 55-gallon container of F008 hazardous waste was being stored in another hazardous waste storage area near the Utilite Machine area. The words, "Hazardous Waste," were marked on the container and the accumulation start date marked on the container was 7/13/12. *See*, photographs 26 and 27.

Near the F008 hazardous waste storage area, universal waste lamps were being stored. In the Universal Waste Storage Area, the fluorescent light bulb storage containers were not labeled with the words, "Universal Waste Lamps," or, "Used Lamps," and one container was not closed. No accumulation date was marked on the containers and there was no other method being used to determine the length of storage. *See*, photograph 29.

Lastly, Mid City Plating had a laboratory on-site for product testing. Mr. Muzzarelli stated that the material used in the testing is poured down the sink, and he stated that the material will travel to the WWTU for treatment. *See*, photograph 30.

This concluded the site inspection and we continued to a conference room where I conducted the Records Review.

RECORDS REVIEW:

Mr. Muzzarelli aided me in the review of the hazardous waste records after completing the physical site inspection.

1. Personnel Training

Mid City Plating did have a RCRA training program in place, which included maintaining documentation of annual refresher training. He did have a certificate of RCRA training from Delta Chemicals, who performed the training.

2. Manifests

I reviewed the manifests of the hazardous waste shipments for the years 2011, 2012, and 2013. Mid City Plating did provide me with copies to review of 5 manifests, as listed below, of waste that they had shipped in those time periods.

Date	Amount	Hazardous Waste Codes	Manifest Number	TSD Destination
9/26/2011	20 Cubic Yards	F006		Veolia
4/3/2012	4000 lbs	F006	009122698JJR	Envirite
4/3/2012	500 G	D007	009122697JJR	EQ Detroit
4/3/2012	715 G	F008	009122697JJR	EQ Detroit
1/28/2013	2000 lbs	F006		Envirite
1/28/2013	1200 lbs	F008		EQ Detroit

3. Waste Analysis and Recordkeeping

I observed that Mid City Plating did have, as a record on-site, a land disposal restriction (LDR) notification form for shipments of hazardous waste.

4. Contingency Plan

A Contingency Plan was available for my review during the inspection and contained all of the elements required under 329 Indiana Administrative Code 3.1-10-1 and 40 Code of Federal Regulations section 265.52.

5. Preparedness and Prevention

Agreements with local emergency authorities, contractors, or local hospitals were available for my review during the inspection.

6. Annual Reporting

Mid City Plating filed an annual report with the Indiana Department of Environmental Management by March 1 for the reporting years of 2011 and 2012.

7. Weekly and Daily Inspections

At the time of the inspection, Mid City Plating was conducting weekly inspections of the hazardous waste storage area. However, they were not conducting weekly inspections of the one cubic yard box that was being stored near the WWTU. Mr. Muzzarelli explained that he was not aware that that was a ninety day storage area.

CLOSING CONFERENCE:

I conducted the closing conference with Mr. Muzzarelli. I explained to him that I would need to review my notes and photographs before making any compliance decisions. I also explained that I would submit a copy of my inspection report along with the photo log to Mid City Plating.

I departed Mid City Plating around 1:30pm.

ATTACHMENT: (4)

Attachment 1	Photographs taken during the time of the inspection.
Attachment 2	Inspection Checklist